



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

September 28, 2017

Richard G. Kowalski, CPG, LSP, CHMM
Senior Hydrogeologist
AEI Consultants
112 Water Street, 5th Floor
Boston, MA 02109

Dear Mr. Kowalski:

I am writing this letter to summarize the issues discussed at the pre-application meeting held on September 19, 2017 at the Department of Environmental Management (DEM). An attendance sheet is attached with this letter.

The purpose of the meeting was to review permitting requirements for the closure of the former Ciba-Geigy site, (specifically Lot 1102), located at 180 Mill Street in Cranston, Rhode Island. Issues discussed at the meeting included:

- The site is currently vacant and is comprised of a number of concrete slabs and moderately vegetated soils that are contaminated with PCBs and other toxics that require removal in some areas and capping the site with clean fill and, in some areas, a geotextile liner with clean fill.
- The property, Lot 1102, is located adjacent to the Pawtuxet River. In addition to the river, Freshwater Wetland jurisdictional areas include the river floodway, the 100-year floodplain and the 200-foot riverbank wetland.
- The plan for remediation of the site includes removal of contaminated soils in the floodway and backfill to the original grade, removal of PCB contaminated soils to a level of 25 ppm, cover contaminated soils with a level greater than 10 ppm with a geotextile and two-foot soil cover, and cover contaminated soils with a level of one ppm or greater with a two-foot soil layer only. The capping plan will result in the placement of fill within the 100-year floodplain.
- DEM noted that the Pawtuxet River has a high occurrence of flooding and that any flooding impacts due to the placement of fill in the floodplain should be compensated for by an equivalent volumetric removal of soil. If a fill/cut balance cannot be achieved, the applicant would need to show through a hydraulic analysis that there would be a negligible impact on the floodplain elevation and that any resulting impact would not affect other properties or structures.



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30% post-consumer fiber

- The consultants indicated that they were in a process with FEMA to show that the impacts from the placement of fill would have no impact on the FEMA floodplain elevation. They indicated that FEMA concurrence is expected from the analysis.
- DEM indicated that a similar analysis would be required to show that there would be a negligible impact to the floodplain on the adjacent properties. DEM noted that if there is a six inch or greater increase in the flood elevation on an adjacent property, either the property owner signature would be needed on an application to the Freshwater Wetlands Program or the affected owner would need to provide a notarized authorization letter allowing BASF to act as the applicant.
- DEM noted that due to the placement of uncompensated fill in the floodplain and the uncertainty at this time of the impacts, the applicant may submit an Application to Alter Freshwater Wetlands with a request to downgrade the application to a Preliminary Determination if it is found that the alteration can be determined to be insignificant.

This concludes RIDEM's comments regarding this meeting. I hope that they are of assistance to you. This letter does not relieve the property owner from his/her obligation to obtain any local, state, or federal approvals or permits required by ordinance or law.

If you have any questions concerning this meeting or the permitting process, please contact me at (401) 222-6822, extension 7500.

Sincerely,



Ronald N. Gagnon, P.E., Chief
Office of Technical and Customer Assistance

cc: Meeting attendees